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KPB[mbest@borough.kenai.ak.us]
From: Casey, Dave C POA
Sent: Fri 2/15/2013 6:32:34 PM
Subject: RE: request for feedback on wetland hydro functions (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Hi Devony,

Nice to hear from you and I hope you have been doing well. Katie will just be getting back from time out of the office on 25 Feb and won't have time to review the document or participate. Also, I will be traveling to Juneau on 25 Feb. However, as we have expressed to the HSWCD in the past, we believe the complete methodology used for the City of Homer's Wetland Functional Assessment, is the appropriate and scalable wetland functional assessment that should be used to identify the functions and services of freshwater wetlands on the western Kenai Peninsula.

As we have expressed to the HSWCD in the past, your departing from this approach is creating two different assessment methodologies for at least two watersheds on the southern peninsula (Anchor River and Diamond Creek) which will create uncertainty for landowners, permit applicants, and providers of compensatory mitigation because it will cause an unclear understanding of fresh water wetland functions and services in these watersheds.

Additionally, the departure is also particularly confusing because:

1. There is no new baseline information since the Homer Assessment was finalized. That is, the Homer Assessment's approach and your approach both rely on the database of the Kenai Lowlands Wetland Mapping effort to provide much of "horsepower" of the analysis. So in effect, continuing on your course will create two different interpretations of the same data; and,
2. Homer's Assessment Methodology, also based on the Anchorage Wetland Assessment Methodology, has been in place now for 5 years. Since the City of Homer adopted the Assessment and Rankings, we are unaware of any concerns from agencies, the public or permit

applicants that the assessment or rankings misrepresent the wetland's "on-the-ground" condition. Further, we have seen, permit applicants use the "High", "Moderate", and "Low" wetland rankings as a tool to guide their development plans away from higher value wetlands and towards wetlands that provide fewer functions and services. Lastly, the Homer Assessment and rankings have been cited by people providing public comments on projects the Corps has evaluated for Department of the Army permits; and in once case, the Homer Assessment helped support a permit denial for a project that would have resulted in the loss of both "moderate" and "high" ranking wetlands.

I am sorry for sounding like a broken record on this topic but the continuation of your approach (deviating from the Homer Wetland Functional Assessment Methodology) is not something we support.

V/R,

dc

Dave Casey

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From: Devony Lehner [mailto:Ex. 6 PII, Devony Lehner]

Sent: Thursday, February 14, 2013 11:22 PM

To: Casey, Dave C POA; McCafferty, Katherine A POA

Cc: Phil; Kahn, Lynnda; Ginny Litchfield; Mike Gracz; Sue; John Czar; Daniel Bevington; Matt Gray; tara@homerswcd.org; Karyn Noyes

Subject: request for feedback on wetland hydro functions

Greetings Dave and Katie,

We'd really value your feedback on the attached outline of hydrology functions for the Kenai Peninsula landscape-level wetland assessment. As summarized in the short attachment, we're proposing to update the approach used in Anchorage. On February 25, we'll discuss proposed changes with available steering committee partners and provide them with a project update.

We'd love to have you there if you're available—at the River Center starting at 10 am. If you can't make it, please let me know by next Friday of any feedback you'd like us to consider in our discussion. (In addition to Tara, Karyn, and me, we're expecting Phil North, Lynnda Kahn, Mike Gracz, Sue Mauger, and hopefully Ginny Litchfield, to be able to attend.)

Our final report to EPA is due by the end of March. We don't see any reason that we won't be able to meet that deadline, but we want to be sure you're in the loop on the hydro approach we're proposing. Please take a look at the attachment and let us know what you think. If you have any questions, please feel free to call **Ex. 6 PII**

Thanks so much!

Devony

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Caveats: NONE